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*Counsel to the Official Committee of
Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	Case No. 22-10943 (MEW)
)	
Debtors.)	(Jointly Administered)
)	
_____)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Adv. Proc. No. 22-01138 (MEW)
)	
PIERCE ROBERTSON, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**CERTIFICATE OF NO OBJECTION REGARDING
MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
PURSUANT TO FEDERAL RULE 24 AND BANKRUPTCY RULE 7024
TO INTERVENE IN ADVERSARY PROCEEDING**

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the
Southern District of New York (the “Local Bankruptcy Rules”), and in accordance with the

Amended Notice of Motion of the Official Committee of Unsecured Creditors Pursuant to Federal Rule 24 and Bankruptcy Rule 7024 to Intervene in Adversary Proceeding [Docket No. 11] (the “Notice”), the undersigned counsel for the Official Committee of Unsecured Creditors of Voyager Digital Holdings, Inc., *et al.* (the “Committee”) in the above-captioned chapter 11 cases hereby certifies as follows:

1. On August 26, 2022, the Committee filed the *Motion of the Official Committee of Unsecured Creditors Pursuant to Federal Rule 24 and Bankruptcy Rule 7024 to Intervene in Adversary Proceeding* [Docket No. 9] (the “Motion”).

2. The Notice and Motion were served by undersigned counsel to the Committee as reflected in the certificates of service attached to and filed with the Notice and Motion.

3. Pursuant to the Notice, the deadline for parties to object or file responses to the Motion was October 11, 2022 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

4. Local Rule 9075-2 provides that the Motion may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the entity that filed the Motion complies with such rule.

5. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline, and the undersigned counsel hereby certifies that as of the date hereof, no objection or other response to the Motion has been filed or served pursuant to the Notice.

6. Accordingly, the undersigned counsel requests entry of the proposed order attached hereto as **Exhibit A** (the “Proposed Order”) at the Court’s earliest convenience.

7. If not entered prior to the hearing, the Committee will seek entry of the proposed order at the telephonic-only hearing scheduled for 2:00 p.m., prevailing Eastern Time, on

October 19, 2022, before the Honorable Michael E. Wiles, United States Bankruptcy Judge,
United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
October 14, 2022

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2022, I caused a true and correct copy of the foregoing *Certificate of No Objection Regarding Motion of the Official Committee of Unsecured Creditors Pursuant to Federal Rule 24 and Bankruptcy Rule 7024 to Intervene in Adversary Proceeding* to be served on the parties below by ECF and e-mail as indicated below.

/s/ Darren Azman

Darren Azman

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